

(SPACE BELOW FOR FILING STAMP ONLY)

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Appearing Specially as Attorneys for Defendant RBDM Rager, Meyer Accountancy Corp.
named as Rager, Bell, Dorskocil and Meyer
and appearing specially and jointly as Attorneys for Defendant
Brad Dorskocil, CPA,

IN THE UNITED STATES DISTRICT COURT

FOR THE NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

Steve Nerayoff,

Plaintiff(s),

vs.

Rager, Bell, Dorskocil and Meyer, et al. ,

Defendant(s).

CASE NO.: C 07-03101 JW

DECLARATION OF STEPHANIE
SESSIONS PERKINS

[FILED CONCURRENTLY WITH AND IN
SUPPORT OF JOINT STIPULATED
REQUEST FOR AN ORDER
CONTINUING CASE MANAGEMENT
CONFERENCE AND DEFENDANTS'
DEADLINE TO RESPOND TO FIRST
AMENDED COMPLAINT]

DECLARATION OF STEPHANIE SESSIONS PERKINS

I, STEPHANIE SESSIONS PERKINS, declare:

1. I am Senior Counsel with law firm of Chapman, Glucksman & Dean, attorneys of
record for specially appearing defendants RBDM Rager Meyer Accountancy Corp. ("RBDM")
and Brad Dorskocil, CPA (RBDM and Brad Dorskocil are herein collectively referred to as
"Defendants"). If called upon to testify, I could and would competently testify to the following
under oath.

1 2. Defendants RBDM, Rossi, Daskocil & Finkelstein, LLP ("RDF") and Brad
2 Daskocil, CPA responses to the First Amended Complaint are due to be filed on January 8, 2007.

3 3. Counsel for Defendants and Plaintiff, Steven Nerayoff ("Plaintiff"), are currently
4 working towards non-judicial resolution of issues relative to venue and a potential tolling
5 agreement pending the outcome of Plaintiff's tax case now in the United States Tax Court and/or
6 with the Internal Revenue Service out of which these matters arise. Counsel for Defendants and
7 Plaintiff, are evaluating the judicial efficiency of proceeding with this action, regardless of venue,
8 pending the outcome of the above-referenced United States Tax Court and/or the Internal Revenue
9 Service matters. However, discussions between the parties and their counsel regarding the same
10 have been unexpectedly interrupted and/or delayed in part because Plaintiff's counsel, Paul Rice,
11 has experienced a family emergency which has taken him away from the office and rendered him
12 otherwise unable to attend to this matter.

13 4. Judicial economy merits a continuance of Defendants' deadline to respond to the
14 First Amended Complaint to January 29, 2007. This continuance will afford Mr. Rice time to
15 attend to a family emergency and should also allow the parties sufficient time to complete their
16 factual investigation and negotiations such that the action may be dismissed without prejudice
17 prior to such date or, in the alternative, matters of venue may be fully evaluated so that pleadings,
18 including possible motions to dismiss and/or transfer the matter may be filed.

19 5. I have discussed the scheduling and other issues presented in this Joint Stipulation
20 with Paul E. Rice's office and John S. Blackman, counsel for RDF and jointly for Brad Daskocil.
21 Counsel for all parties join in this request for a continuance of the deadline for Defendants to
22 respond to the First Amended Complaint.

23 6. A previous extension of time to respond to the original Complaint was sought in
24 this case and granted affording Defendants RBDM and Daskocil until January 8, 2007 to file
25 responsive pleadings.

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STEPHANIE SESSIONS PERKINS